

EXHIBIT D

Wendy Tsang

From: Ed Cerasia <ed@cdemploymentlaw.com>
Sent: Thursday, June 30, 2022 7:08 AM
To: Wendy Tsang
Cc: Damian Cavaleri; Fiona Carmody; Alison Tomasco
Subject: RE: Carmody v. NYU - Follow up on Documents Requested at Depositions

Wendy –

In connection with the defendants' collection efforts in discovery, there was a search for text messages. No responsive texts have been located. Nonetheless, we have circled back with NYU on this topic and will confirm the same.

Regards,
Ed

Edward Cerasia II
cerasia law llc
employment lawyers

One Liberty Plaza | 165 Broadway, 23rd Floor | New York, New York 10006
101 Eisenhower Parkway, Suite 300 | Roseland, New Jersey 07068
Telephone 646.525.4231 | Telephone 973.786.1368 | Mobile 973.809.9552 | Fax 646.525.4237
ed@cdemploymentlaw.com | www.cdemploymentlaw.com

This transmission is intended only for the proper recipient(s). It is confidential and may contain information protected by the attorney-client privilege. If you are not the proper recipient, please notify the sender immediately and delete this message. Any unauthorized review, copying or use of this message is prohibited.

From: Wendy Tsang <wtsang@hnrklaw.com>
Sent: Wednesday, June 29, 2022 5:43 PM
To: Ed Cerasia <ed@cdemploymentlaw.com>; Alison Tomasco <Alison@cdemploymentlaw.com>
Cc: Damian Cavaleri <dcavaleri@hnrklaw.com>; Fiona Carmody <fcarmody@hnrklaw.com>
Subject: Carmody v. NYU - Follow up on Documents Requested at Depositions

Ed,

I write to follow up in writing on documents formally requested during the depositions of Dr. Francois and Dr. Brotman, described again below for reference:

1. Text Messages between Dr. Francois and Dr. Grossman, Dr. Abramson, Dr. Femia, and/or Dr. Jamin that are responsive to Plaintiffs' First Set of Requests for Production of Documents, dated January 28, 2022.
2. Text Messages between Dr. Brotman and Dr. Francois, Dr. Grossman, and/or Dr. Femia that are responsive to Plaintiffs' First Set of Requests for Production of Documents, dated January 28, 2022.

It is our position that these documents are already covered by existing requests in Plaintiff's First Set of Requests for Production of Documents, and should therefore already have been produced. I ask that you let us know by **Friday, July 1st** whether Defendants agree to search for the requested documents, or whether Defendants are going to refuse to perform a search for responsive documents/information.

Best,

Wendy

Wendy Tsang



One Grand Central Place
60 East 42nd Street, 48th Floor
New York, NY 10165
T 212.689.8808 | F 212.689.5101

[website](#) | [vCard](#) | [email](#)

This email transmission constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 U.S.C. Section 2510, and its disclosure is strictly limited to the recipient(s) intended by the sender of this message. This transmission, and any attachments, may contain confidential attorney-client privileged information and attorney work product. Any unauthorized disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is prohibited. If you are not an intended recipient, please notify the sender by reply email and immediately delete and/or destroy the original transmission and any attachments.